

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Lisa Ann Spinnicchio Charles J. Spinnicchio, III <u>Debtors</u> <u>PENNYMAC HOLDINGS, LLC , C/O</u> <u>PENNYMAC LOAN SERVICES, LLC</u> v. Lisa Ann Spinnicchio Charles J. Spinnicchio, III (CoDebtor) and Charles Dehart, III	13-00728 MDF Chapter 13 Proceeding
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**DEBTORS' ANSWER TO MOTION FOR RELIEF FROM
THE AUTOMATIC STAY OF SECURED CREDITOR**

AND NOW, comes Lisa Ann Spinnicchio and Charles J. Spinnicchio, DEBTORS, by and through their attorney Dawn M. Cutaia of Cutaia Law, LLC, and file this Answer in response to the Motion for Relief from Stay filed by Pennymac Holdings, LLC.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part; Denied in part. It is admitted that the value as of the date of the filing of petition four years ago was \$200,000.00. However, it is likely that the value of the property has increased substantially in the past four years.
 - a. Admitted.
7. Admitted in part; Denied in Part. Debtors were in arrears, but have since paid all outstanding arrears, in the amount of \$5650.00, as of February 2, 2017.
8. Denied. The arrears have been paid in full, there is likely equity in the property, the Debtors have been in a Chapter 13 for four years, and the mortgagee is not suffering any irreparable harm.

WHEREFORE, Debtor respectfully requests this Honorable Court deny the Motion for Relief from Stay.

RESPECTFULLY SUBMITTED,

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By: /s/ Dawn M. Cutaia

Dated: 2/3/2017